

Exhibit C

Walker, John

From: Remus, Mark
Sent: Tuesday, November 28, 2023 8:55 AM
To: Halverson, Erik J.; Walker, John; Frankel, William; Askuvich, Alissa; Aaron Olejniczak; Chris Liro
Cc: Beane, Devon Curtis; Brown, Ketajh M.
Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

Hi Erik-

The confirms the meet and confer that we had on Nov. 17 regarding Milestone's response to BCI's Interrogatory No. 3. I explained that Milestone's anticipation and obviousness contentions (if any) are relevant to whether Mr. Whitley did "more than merely explain to the real inventors well-known concepts and/or the current state of the art." You disagreed and indicated that Milestone would not be supplementing its response to Interrogatory No. 3. It is our understanding that the parties are at an impasse. To the extent our understanding is incorrect, please let us know by the end of the day.

-Mark

Mark Remus

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mremus@crowell.com
+1.312.321.4720 direct | +1.312.404.0328 mobile

From: Halverson, Erik J. <Erik.Halverson@klgates.com>
Sent: Friday, November 17, 2023 9:42 AM
To: Remus, Mark <MRemus@crowell.com>; Walker, John <JohnWalker@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>
Cc: Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>
Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

External Email

Hi Mark,

I can do 3:30 CT today.

As for the documents, if you can confirm that BCI's document production in response to Defendants' RFPs served to-date is complete, then I have no further issues on that front.

Thanks,
Erik



Erik Halverson
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From: Remus, Mark <MRemus@crowell.com>

Sent: Friday, November 17, 2023 7:19 AM

To: Halverson, Erik J. <Erik.Halverson@klgates.com>; Walker, John <JohnWalker@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>

Cc: Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>

Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

Hi Erik-

Does 3:30 CT today work for you?

With respect to BCI's document production, on November 14 you asked when BCI would be producing documents and then John Walker produced those documents on November 15. At no point did you identify any deficiencies. To the extent you believe the document production is deficient, please identify those deficiencies.

-Mark

Mark Remus

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From: Halverson, Erik J. <Erik.Halverson@klgates.com>

Sent: Thursday, November 16, 2023 3:37 PM

To: Remus, Mark <MRemus@crowell.com>; Walker, John <JohnWalker@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>

Cc: Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>

Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

External Email

Hi Mark,

I can be available tomorrow after 11am CT. To facilitate the discussion, as set forth in *Bushberger v. Protecto Wrap Co*, No. 07-CV-8, 2008 WL 725189, at *5 (E.D. Wis. Mar. 17, 2008), a contribution to subject matter in a dependent claim, which need not have its own independent basis for novelty, is a contribution necessitating joint inventor status as such an invention, by being included in the patent, is therefore a significant contribution.

Please further be prepared to discuss my email to Mr. Walker of November 14 regarding Plaintiff's deficient production.

Thanks,
Erik



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From: Remus, Mark <MRemus@crowell.com>
Sent: Wednesday, November 15, 2023 9:22 AM
To: Halverson, Erik J. <Erik.Halverson@klgates.com>; Walker, John <JohnWalker@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>
Cc: Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>
Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

Hi Erik-

Please let me know when you are available to meet and confer regarding Milestone's responses to Interrogatory No. 3 and Request for Production Nos. 7-8. Prior art and Milestone's validity contentions are relevant to, inter alia, whether Mr. Whitley did "more than merely explain to the real inventors well-known concepts and/or the current state of the art." See *Pannu v. Iolab Corp.*, 155 F.3d 1344, 1351 (Fed. Cir. 1998).

I am available any time tomorrow.

-Mark

Mark Remus

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From: Halverson, Erik J. <Erik.Halverson@klgates.com>
Sent: Monday, November 6, 2023 5:22 PM
To: Walker, John <JohnWalker@crowell.com>; Remus, Mark <MRemus@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>
Cc: Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>
Subject: RE: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

External Email

Counsel,

Attached please find Defendants' discovery responses. Additionally, the production for today has been uploaded to the following link and should be available for downloading. Please let me know if you have any issues accessing.

<https://kandlgates.box.com/s/rca24fiju269t8fv003golxqvau1w84s>

Best,
Erik



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From: Walker, John <JohnWalker@crowell.com>

Sent: Thursday, October 5, 2023 2:20 PM

To: Halverson, Erik J. <Erik.Halverson@klgates.com>; Beane, Devon Curtis <Devon.Beane@klgates.com>; Brown, Ketajh M. <Ketajh.Brown@klgates.com>

Cc: Remus, Mark <MRemus@crowell.com>; Frankel, William <WFrankel@crowell.com>; Askuvich, Alissa <AAskuvich@crowell.com>; Aaron Olejniczak <aarono@andruslaw.com>; Chris Liro <chris.liro@andruslaw.com>

Subject: BCI Acrylic v. Milestone Bath Products - BCI Acrylic's first set of RFPs and ROGs

Dear counsel,

Please find attached BCI Acrylic Inc.'s First Set of Requests for Production and First Set of Interrogatories.

Thank you,

John Walker

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